

## The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

V.

\$16,692.00 IN UNITED STATES  
CURRENCY, more or less, and all proceeds  
therefrom;

ONE (1) 2008 KOMFORT RIDGECREST 26' TRAILER WITH VIN 1K52KBM2082000941; and

**TWENTY (20) PIECES OF ASSORTED  
JEWELRY AND PRECIOUS METALS:**

NO. C12-1888 RAJ

**DEFAULT JUDGMENT OF  
FORFEITURE**

### **[PROPOSED]**

Plaintiff, United States of America, filed its Verified Complaint for Forfeiture In Rem

against the above-captioned defendant property on October 25, 2012, pursuant to the provisions

of 21 U.S.C. § 881(a)(4) and (6) for violations of 21 U.S.C. § 841(a)(1) (Distribution of

Controlled Substances), 21 U.S.C. § 843(a)(3)( Obtaining a Controlled Substance by

Misrepresentation, Fraud, Forgery, Deception, or Subterfuge), and 21 U.S.C. § 846 (Conspiracy).

1 On January 3, 2013, the United States filed a Notice of Complaint for Forfeiture In Rem  
 2 in which all interested persons were advised to file their claims pursuant to Supplemental Rule  
 3 G(5) of the Federal Rules of Civil Procedure with the Clerk of the Court not later than thirty-five  
 4 (35) days after the date of service of the complaint or, as applicable, not later than thirty (30)  
 5 days after the date of final publication of notice of the filing of the complaint, and to serve their  
 6 Answers to the Complaint within twenty-one (21) days after filing a claim. *See* Docket No. 6.

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 8 On January 3, 2013, the United States served Linh Thi-Dieu Vanbogart with copies of the  
 9 Verified Complaint for Forfeiture In Rem, the Notice of Complaint for Forfeiture In Rem, and  
 10 the Warrants of Arrest In Rem, via certified mail, in accordance with Rule G(4)(B) of the  
 11 Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal  
 12 Rules of Civil Procedure. The certified mail receipt, article number 7010 2780 0000 0484 4234,  
 13 indicates delivery to Linh Thi-Dieu Vanbogart on January 5, 2013.

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 15 On January 3, 2013, the United States served Sean Christopher Stead with copies of the  
 16 Verified Complaint for Forfeiture In Rem, the Notice of Complaint for Forfeiture In Rem, and  
 17 the Warrants of Arrest In Rem, via certified mail, in accordance with Rule G(4)(B) of the  
 18 Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal  
 19 Rules of Civil Procedure. The certified mail receipt, article number 7010 2780 0000 0484 4241,  
 20 indicates delivery to Sean Christopher Stead on January 5, 2013.

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 22 Notice of the forfeiture action was published on the www.forfeiture.gov website between  
 23 October 28, 2012 and November 26, 2012. All interested persons were advised to file their  
 24 claims pursuant to Supplemental Rule G(5) of the Federal Rules of Civil Procedure with the  
 25 Clerk of the Court within sixty (60) days after the first date of publication and to serve their  
 26 Answers to the Complaint within twenty-one (21) days after filing a claim.

1 More than thirty-five (35) days have passed since the Verified Complaint for Forfeiture  
2 In Rem, the Notice of Complaint for Forfeiture In Rem, and Warrants of Arrest In Rem were  
3 served upon Linh Thi-Dieu Vanbogart and Sean Christopher Stead. More than thirty (30) days  
4 have passed since the final date of publication of notice of the forfeiture action on the  
5 www.forfeiture.gov website. No claim of interest has been received or filed with the Court from  
6 Linh Thi-Dieu Vanbogart, Sean Christopher Stead, or from any other person or entity, and the  
7 time allowed for filing of such a claim has expired.

9 Now, therefore on motion by the Plaintiff, United States of America, for a Judgment for  
10 Forfeiture, it is hereby

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MOTION FOR ENTRY OF DEFAULT JUDGMENT OF FORFEITURE  
United States v. \$16,692.00 in U.S. Currency, *et al.* -- 3

UNITED STATES ATTORNEY  
700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
(206) 553-7970

1 ORDERED, ADJUDGED and DECREED as follows:

- 2 1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and  
3 1355, and venue pursuant to 28 U.S.C. §1395.
- 4 2. Pursuant to 21 U.S.C. §§ 881(a)(4) and (6) the following property is forfeited to  
5 the United States of America, and no right, title, or interest in the defendant  
6 currency shall exist in any other party:
- 7 a. \$16,692.00 in United States Currency, more or less, and all proceeds  
8 therefrom;
- 9 b. One (1) 2008 Komfort Ridgecrest 26' Trailer with VIN  
10 1K52KBM2082000941; and  
11 c. Twenty (20) pieces of assorted jewelry and precious metals seized on May  
12 25, 2012, in Tacoma, WA.
- 13 3. The United States Marshals Service shall dispose of the above-described  
14 defendant currency in accordance with law.

15 DATED this 9<sup>th</sup> day of May, 2013.

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The Honorable Richard A. Jones  
United States District Judge